

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
In Open Court  
USDC, Mass.  
Date 12/19/05  
By WIKI  
Deputy Clerk

UNITED STATES OF AMERICA

v.

DANIEL KAMEN,  
Defendant.

Criminal No. 04-10384-PBS

JOINT MEMORANDUM FOR FINAL STATUS CONFERENCE

The parties submit this Joint Memorandum For Final Status Conference pursuant to Local Rule 1.6.5(C).

The parties hereby report that:

1. The government has provided and made available to the defendant all discovery. There remain certain discovery requests by the defendant to which the government has responded and about which the defendant may file additional motions. It is the view of the government that it has provided all discoverable materials (except those that may be provided as required prior to trial of the matter).
2. Neither of the parties anticipates providing additional discovery.
3. The defendant does not intend to raise a defense of insanity or public authority.
4. The government has not requested notice of alibi.
5. At this time, the defendant does not anticipate filing any motions requiring a ruling by the District Court before trial, other than any motion regarding discovery and which may be ruled on by this Court. The defendant does, however, reserve the right to file other

motions in this matter.

6. The parties have discussed the possibility of an early resolution to the case but remain short of such a resolution and consider a trial to be likely.
7. The parties hereby agree to the periods already excluded by order of this Court.
8. The defendant hereby requests (with no objection from the government) an additional period of forty-five (45) days in which to pursue additional matters.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney  
By:

/s/ Paul R. Moore  
Paul R. Moore  
Assistant U.S. Attorney

Respectfully submitted,

DANIEL KAMEN  
Defendant  
By:

/s/ Charles Rankin  
Charles Rankin, Esq.  
Peter Elikann  
Counsel for the Defendant

DATE: December 19, 2005